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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

Sally C. Purser,)
)
Plaintiff,)
)
vs.)
)
Josef F. Boehm, et al.,)
)
Defendants.)
) **Case No. A05-0085 CV (JKS)**

PLAINTIFF'S JURY INSTRUCTIONS

Plaintiff substantially agrees with the Court's proposed jury instructions at Docket 228-2, except that the standard preliminary, end of case and concluding instructions from the Ninth Circuit Model Civil Jury Instructions should be given to the Jury, including but not limited to:

- 1.8 Credibility of Witnesses
- 3.2 What is evidence.
- 3.3 What is not evidence
- 3.4 Opinion Evidence, Expert Witnesses
- 3.8 Causation

In addition, this Court's proposed Instruction No. 4, and its other instructions regarding damages should be amended to include a claim for loss of earning capacity and economic loss,

consistent with Model Civil Jury Instruction 7.2. Plaintiff will introduce the testimony of an Economist to show the amount of these losses. Plaintiff's Expert, Michael Rose, Ph.D. will also provide testimony as to causation with regard to economic loss.

Plaintiff adopts the special verdict form prepared by the Court at Docket 228-2, with one amendment. Paragraph 2 should be amended to include another subparagraph on the amount of economic loss, wages and future earning capacity.

DATED this 5th day of July 2007.

/s/ Darryl Jones
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